FILED

October 15, 2024

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To:

Class Action Clerk
United States District Court for the Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102-3489

CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

From:

Cristian E. Ioszpe 203 Lonesome Woods Road Tallahassee, FL 32305 850-567-3770

RE: Katz-Lacabe et al v. Oracle America, Inc., Case Number 3:22-cv-04792-RS.

Per the Court's Decision [...] "All natural persons residing in the United States whose personal information, or data derived from their personal information, was acquired, captured, or otherwise collected by Oracle Advertising technologies or made available for use or sale by or through ID Graph, Data Marketplace, or any other Oracle Advertising product or service from August 19, 2018 to the date of final judgment in the Action." I therefore believe myself to be a member of the class.

## **OBJECTIONS:**

On the basis of fair compensation to the individual class members, I strongly object to the [total] monetary compensation amount as specified in the terms of the 'Notice of Proposed Class Action Settlement' (hereinafter referred to as the "Notice") for it is, in my opinion, insufficient to fairly compensate the affected 220+ million Class Members, given that; in part, the Notice calls for:

- 1) "Class Counsel will ask the Court to award up to 25% of the Settlement Fund (i.e. up to \$28.75 million) for attorneys' fees",
- 2) "Class Counsel will ask the Court to reimburse them out of the Settlement Fund for the expenses [...] not to exceed \$225,000"
- 3) "Class Counsel will [...] Service Awards of up to \$10,000 each [...] as Plaintiffs and Class Representatives out of the Settlement Fund"

For instance, as other objectors to the Notice have rightfully pointed out:

- "[...] 4) using the 1.5%-2.5% claims submission rate estimated by Leif [...] class members will receive **no monetary compensation whatsoever**". -Page 4 of Objector and Class Member, Christopher L. Williams.
- "[...] 1) Oracle has earned **billions** of dollars from the sale of the private and personal information of the members of the Class... after expenses and attorney's fees are subtracted from

the proposed settlement, what remains is less than \$[0].35 per class member ..." (emphasis mine)

-Page 1 of Objector and Class Member, Roger M. Loeb.

"[...] I do not believe the relief the settlement provides is fair, ... If the Class Representatives will receive up to \$10,000, that is the ceiling of what the settlement considers as the value of my personal information."

-Page 1 of Objector and Class Member, Khyber Zaffarkhan.

It seems unconscionable that the defendants should receive the proposed (and all it encompasses) Liability Release and other additional benefits from settlement, in exchange for what seems a trivial consideration amount for each of the individuals in the Class.

Furthermore, not all Class Members have at their disposal the time and/or resources to fully investigate any and all damages alleged by the plaintiff(s) and the ramifications of these allegations, or how these may have potentially affected, are affecting, or will affect, the rights and lives of the Class Members based and/or caused by the alleged actions and/or practices of defendant. We, as Class Members and affected parties, do not fully know the extent or derivative work (and its repercussions) generated from the collection of our (Class Member's) information.

By extension, the settlement would be providing a release to each of the parties that the defendant sold, shared, or exchanged [our] information with. Again, without knowing the full extent of the impacts of those actions on Class Members.

Clearly, I do not condone any of the defendant's actions and/or practices as alleged in the complaint

I do NOT intend to appear at the Final Approval Hearing, due to financial reasons it is prohibitively expensive.

I am NOT represented by counsel, NOR have I or plan on retaining counsel for this matter.

Cristian E. Ioszpe

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CLASS ACTION CLERK

RECEIVED UNITED STATES DISTRICT COURT for the MOTHERN DISTRICT of CALIFORNIA

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SAN FRANCISCO, CA 94102-3489 CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

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